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7 Attorneys for GOOGLE LLC

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA**

10 **SAN FRANCISCO DIVISION**

11
12
13 GOOGLE LLC,

14 Plaintiff,

15 v.

16
17 SONOS, INC.,

18 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN
SUPPORT OF GOOGLE LLC'S MOTION
FOR LEAVE TO AMEND INVALIDITY
CONTENTIONS PURSUANT TO PATENT
L.R. 3-6**

1 I, Nima Hefazi, declare as follows and would so testify under oath if called upon to do so:

2 1. I am of counsel at the firm of Quinn Emanuel Urquhart & Sullivan, LLP and am
3 counsel of record for Plaintiff Google LLC (“Google”). I am a member in good standing of the Bar
4 of the State of California. I make this declaration based on my personal knowledge, unless otherwise
5 noted. If called, I can and will testify competently to the matters set forth herein.

6 2. I make this declaration in support of Google’s Motion for Leave to Amend Invalidity
7 Contentions Pursuant to Patent Local Rule (“PLR”) 3-6.

8 3. On December 20, 2021, the parties exchanged proposed terms for construction in
9 compliance with PLR 4-1.

10 4. On January 10, 2022, the parties simultaneously exchanged their proposed
11 preliminary constructions for the selected claim terms pursuant to PLR 4-2.

12 5. Attached as Exhibit 1 is a true and correct copy of Google’s proposed Amended
13 Invalidity Contentions with redlines to reflect Google’s proposed changes.

14 6. Attached as Exhibit 2 is a true and correct copy of an August 2022 email chain
15 between myself, counsel for Google, and Cole Richter, counsel for Sonos, Inc. (“Sonos”).

16 I declare under penalty of perjury that the foregoing is true and correct to the best of my
17 knowledge.

18 Executed this 30th day of August, 2022 in Los Angeles, California.

19
20 DATED: August 30, 2022

Respectfully submitted,

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22 By /s/ Nima Hefazi
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ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

DATED: August 30, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven